

**Exhibit B**  
**(Stark Declaration)**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
LORDSTOWN MOTORS CORP., <i>et al</i> , <sup>1</sup>	)	Case No. 23-10831 (MFW)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	
	)	

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**DECLARATION OF ROBERT J. STARK IN SUPPORT OF  
APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT  
AND RETENTION OF BROWN RUDNICK LLP AS COUNSEL FOR  
THE OFFICIAL COMMITTEE OF EQUITY SECURITY HOLDERS OF  
LORDSTOWN MOTORS CORP., ET AL., *NUNC PRO TUNC* TO SEPTEMBER 7, 2023**

Pursuant to 28 U.S.C § 1746, I, Robert J. Stark, hereby declare:

1. I am an attorney admitted to practice in the State of New York and am a member of the law firm of Brown Rudnick LLP (“Brown Rudnick”), which maintains an office at Seven Times Square, New York, NY 10036.

2. I submit this Declaration (the “Declaration”) in support of the application (the “Application”)<sup>2</sup> of the Official Committee of Equity Security Holders (the “Equity Committee”) appointed in the above-captioned cases (the “Cases”) for entry of an order, pursuant to sections 328 and 1103(a) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), authorizing and approving the retention and employment of Brown Rudnick as counsel to the Equity Committee in connection with these Cases effective as of September 7, 2023.

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

3. Except as otherwise indicated herein, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

**BROWN RUDNICK'S QUALIFICATIONS AND EXPERIENCE**

4. Brown Rudnick is well qualified and able to represent the Equity Committee in a cost effective and efficient manner. Among the reasons Brown Rudnick was selected as counsel includes our deep bankruptcy bench with experience in bankruptcy sales and litigation representing committees in the largest and most complex chapter 11 cases. Brown Rudnick's Bankruptcy and Corporate Restructuring team is focused, first and foremost, on official committee engagements in large chapter 11 cases. We are known for passionate and zealous advocacy on behalf of official committees. In addition to its attorneys with decades of experience in restructuring, Brown Rudnick has a large and well-respected litigation group at the Equity Committee's disposal.

5. Brown Rudnick has successfully represented official committees of creditors and equity security holders and debtors in many prominent and complex bankruptcy cases, including, among others:

*Al23 Systems, Inc.* (D. Del.)  
*A.H. Robbins Company, Incorporated* (E.D. Va.)  
*Adeptus Health Inc.* (N.D. Tex.)  
*Adelphia Communications* (S.D.N.Y.)  
*Aearo Technologies LLC* (S.D. IN)  
*Aereo, Inc.* (S.D.N.Y.)  
*Allis-Chalmers Corporation* (S.D.N.Y.)  
*Alta Mesa Holdings* (S.D. Tex.)  
*Alpha Guardian* (D. Nev.)  
*Ampal-American Israel Corporation* (S.D.N.Y.)  
*Aralez Pharmaceuticals US Inc.* (S.D.N.Y.)  
*Arizona Charlie's, Inc.* (D. Nev.)  
*Beacon Power Corporation* (D. Del.)  
*BeavEx Holding Corporation* (D. Del.)  
*BlockFi Inc.* (D. N.J.)

*Briggs & Stratton Corporation* (E.D. MO)  
*Boomerang Tube, LLC* (D. Del.)  
*BPS US Holdings, Inc.* (D. Del.)  
*Budget Rent-A-Car Corporation* (D. Del.)  
*Calpine Corporation* (S.D.N.Y.)  
*Cerro Negro Oil Project* (Venezuela)  
*Chellino Crane, Inc.* (N.D. Ill.)  
*Chesapeake Energy Corporation* (S.D. Tex.)  
*ClearEdge Power, Inc.* (N.D. Cal.)  
*Comdisco, Inc.* (N.D. Ill.)  
*Coda Holdings, Inc.* (D. Del.)  
*Continental Airlines, Inc.* (S.D. Tex.)  
*Corinthian Colleges, Inc.* (D. Del.)  
*Dana Corporation* (S.D.N.Y.)  
*Days Inns of America, Inc.* (D. Del.)  
*Dewey & LeBoeuf LLP* (S.D.N.Y.)  
*Digital Domain Holdings Corporation* (D. Del.)  
*EdgeMarc Energy Holdings. LLC* (D. Del.)  
*EXCO Resources, Inc.* (S.D. Tex.)  
*Fedders North America, Inc.* (D. Del.)  
*Fisker Automotive Holdings, Inc.* (D. Del.)  
*Global Crossing, Ltd.* (S.D.N.Y.)  
*Global Power Equipment Group* (D. Del.)  
*Gordon Jewelry Corporation* (Zale Corporation) (N.D. Tex.)  
*Granite Corporation* (Askin Capital Management) (S.D.N.Y.)  
*Greate Bay Hotel & Casino, Inc.* (The “Sands”) (D. Nev.)  
*HMP Services Holding Sub III, LLC* (D. Del.)  
*Hooper Holmes, Inc.* d/b/a Provant Health (S.D.N.Y.)  
*IMX Acquisition Corp.* (D. Del.)  
*Integrated Resources, Inc.* (S.D.N.Y.)  
*Ironclad Performance Wear Corporation* (C.D. Cal.)  
*Jagged Peak, A Nevada Corporation* (D. Nev.)  
*Kidde-Fenwal, Inc.* (D. Del.)  
*KIT digital, Inc.* (S.D.N.Y.)  
*Libbey Glass Inc.* (D. Del.)  
*Legacy Reserves, Inc.* (S.D. Tex.)  
*LocatePLUS Holdings Corporation* (E.D. Mass.)  
*LTL Management LLC* (D. N.J.)  
*Lyondell Chemical Company* (S.D.N.Y.)  
*Marvel Entertainment Group, Inc.* (D. Del.)  
*MES International, Inc.* (D. Del.)  
*Mirant Corporation* (N.D. Tex.)  
*Mobile Media Communications, Inc.* (D. Del.)

*Modern Shoe Company LLC* (E.D. Mass.)  
*Motor Coach Industries International, Inc.* (D. Del.)  
*Muzak Holdings LLC* (D. Del.)  
*New England Compounding Pharmacy, Inc.* (E.D. Mass.)  
*New York Racing Association, Inc.* (S.D.N.Y.)  
*Oneida Ltd.* (S.D.N.Y.)  
*Overseas Shipholding Group, Inc.* (D. Del.)  
*Owens Corning* (D. Del.)  
*Partsearch Technologies, Inc.* (S.D.N.Y.)  
*PES Holdings, LLC* (D. Del.)  
*Quigley Company* (S.D.N.Y.)  
*Ravn Air Group, Inc.* (D. Del.)  
*R.E. Gas Development, Inc.* (W.D. Pa.)  
*Real Industry, Inc.* (D. Del.)  
*Reed and Barton Corporation* (E.D. Mass.)  
*Refco, Inc.* (S.D.N.Y.)  
*Revlon, Inc.* (S.D.N.Y.)  
*Riverstone Networks* (D. Del.)  
*R.H. Macy & Co., Inc.* (S.D.N.Y.)  
*Ruby Pipeline, L.L.C.* (D. Del.)  
*Service America Corporation* (D. Conn.)  
*Solutia Inc.* (S.D.N.Y.)  
*The Stratosphere Corporation and Stratosphere Gaming Corp.* (D. Nev.)  
*Sungevity, Inc.* (D. Del.)  
*Telemundo Group, Inc.* (S.D.N.Y.)  
*Texscan Corporation* (D. Ariz.)  
*Todd Shipyards Corporation* (D. N.J.)  
*Tracor Holdings, Inc.* (W.D. Tex.)  
*Tower Automotive* (S.D.N.Y.)  
*Trans World Airlines* (D. Del.)  
*Tropicana Entertainment* (D. Del.)  
*Ultra Petroleum Corp.* (S.D. Tex.)  
*Vector Launch Inc.* (D. Del.)  
*Wang Laboratories, Inc.* (E.D. Mass.)  
*Washington Prime Group Inc.* (S.D. Tex.)  
*WorldCom, Inc.* (S.D.N.Y.)  
*XO Communications* (S.D.N.Y.)  
*Zacky & Sons Poultry, LLC* (C.D. Cal.)

**DISINTERESTEDNESS OF PROFESSIONALS**

6. In preparing this Declaration, an attorney working under my supervision caused the implementation of certain procedures developed by Brown Rudnick's Conflicts Department to

ensure full compliance with the requirements of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules (collectively, the “Statutory Authority”). Pursuant to the Statutory Authority, the attorney worked with Brown Rudnick’s Conflicts Department to cause to be performed an examination and comparison (the “Connections Check”) of the Debtors and non-debtor affiliates, creditors, and other parties-in-interest (collectively, the “Case Parties”). The list of Case Parties is attached hereto as **Schedule 1**. A summary of the results of the Connections Check is attached hereto as **Schedule 2**.

7. Based upon my review of the results of the Connections Check, to the best of my knowledge after diligent inquiry, neither Brown Rudnick, nor any member of Brown Rudnick, nor any attorney associated with or employed by Brown Rudnick, has any “connection,” as such term is used in Bankruptcy Rule 2014(a), with the Debtors herein, their creditors, any other party-in-interest herein, their respective attorneys or accountants, the U.S. Trustee, or any person employed in the office of the U.S. Trustee, except to the extent set forth in **Schedule 2** or as follows:

- a. Brown Rudnick previously represented certain equity security holders, including Crestline Management, L.P. (“Crestline”) and Pertento Partners LLP (“Pertento”) in connection with requesting that the U.S. Trustee appoint an official equity committee in these Cases. Brown Rudnick’s representation of Crestline and Pertento terminated prior to being retained as counsel to the Equity Committee.
- b. Brown Rudnick appears in cases, proceedings, and transactions involving numerous attorneys, accountants, and financial advisors, some of which may represent the Debtors, creditors, or parties-in-interest, or themselves be creditors or parties-in-interest in these Cases. Brown Rudnick has not and will not represent any of these creditors, investors, potential acquirers, parties-in-interest, attorneys, financial advisors, accountants, or any other entity in connection with these Cases.
- c. Brown Rudnick represents many investors, financial institutions, and other persons or entities that may become creditors or parties-in-interest in these Cases. Brown Rudnick has not and will not represent any of these investors, financial institutions, or other creditors or parties-in-interest in connection with these Cases.
- d. Brown Rudnick regularly appears in cases before the United States Bankruptcy Court for the District of Delaware.

8. Notwithstanding any “connection” set forth in **Schedule 2** and except as set forth herein, to the best of my knowledge, any “connection” of Brown Rudnick to the identified entities are limited to matters unrelated to the Debtors.

9. Brown Rudnick currently represents, has represented, and may represent in the future parties in documenting the trading of claims against, interests in, and debt of, the Debtors or their estates. Brown Rudnick has not and will not provide any valuation or strategic due diligence regarding the Debtors in connection with providing such advice. Our work, on behalf of such parties, is generally limited to: (i) the ordinary course review of any underlying loan, interest, or claim documentation in connection with the purchase or sale of such loan, interest, or claim and the review of any upstream trade transaction documentation in connection therewith; or (ii) advice based solely on publicly available information or information obtained in connection with (i) above. Brown Rudnick will also assist such parties with completing the filings or submissions necessary to complete the transfer of a debt, interest, or claim against the Debtors or their estates from a seller to a purchaser.

10. None of Brown Rudnick’s existing clients noted in **Schedule 2** accounted for more than one 1% of Brown Rudnick’s gross revenues for the past twelve (12) months.

11. It is possible that certain of the partners, counsel and associates of Brown Rudnick and such persons’ relatives may have familial or personal relationships, as well as business, contractual, or economic relationships, with officers, directors, and/or shareholders or creditors of the Debtors, competitors of the Debtors, other professionals engaged in these Cases and/or other parties in interest in these Cases. I have not been made aware of any material relationships with any such individual.

12. I am not related to and, to the best of my knowledge, no other attorney at Brown Rudnick is related to (a) any United States Bankruptcy Judge for the District of Delaware or (b) the U.S. Trustee or any person employed by the U.S. Trustee's office.

13. If Brown Rudnick discovers any information that is contrary to or pertinent to the statements made herein, Brown Rudnick will promptly disclose such information to the Court by filing and serving a supplemental declaration.

14. For the reasons stated herein, based on the conflicts search conducted to date and described here, to the best of my knowledge Brown Rudnick is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code and as used in section 328(c) of the Bankruptcy Code, and does not have an interest materially adverse to the interests of the Debtors' estates or any class of creditors or equity holders of the Debtors.

### **PROFESSIONAL COMPENSATION**

15. Subject to this Court's approval, and in accordance with section 330(a) of the Bankruptcy Code and any orders of the Court, Brown Rudnick will charge for its legal services as counsel to the Equity Committee on an hourly basis in accordance with its ordinary and customary hourly rates in effect on the date such services are rendered, and for its actual, reasonable and necessary out-of-pocket disbursements incurred in connection therewith.

16. My current hourly rate is \$1,950. Other attorneys and paraprofessionals will assist with these Cases as needed. As of the date hereof, the hourly rates of Brown Rudnick professionals are in the following ranges:

<b><u>Professional</u></b>	<b><u>Rate Per Hour</u></b>
Partners	\$750 - \$2,250
Counsel	\$290 - \$2,575
Associates	\$420 - \$975
Paralegals	\$425 - \$530



17. The hourly rates set forth above are Brown Rudnick's general hourly rates for work of this nature and are consistent with the customary compensation charged by comparably skilled attorneys at Brown Rudnick in similar matters, including non-bankruptcy matters. In the normal course of its business, Brown Rudnick revises its billing rates on an annual basis.<sup>3</sup>

18. Brown Rudnick has advised the Equity Committee that it intends to seek compensation for all time and expenses associated with the preparation of this application to retain Brown Rudnick and related documents, and the preparation of monthly, interim or final fee applications for Brown Rudnick. It will not bill for the defense of any fee applications. Brown Rudnick will bill any non-working travel time at 50% of the actual time incurred.

19. In addition, Brown Rudnick requests that it be reimbursed for any actual and necessary expenses incurred in representing the Equity Committee, including, but not limited to, business meals, photocopies, courier service, computer assisted research, docket and court filing fees, mail and express mail charges, messenger charges, document processing, telecommunications, travel, court reporting charges, and any other non-ordinary overhead expense such as overtime for secretarial personnel and other staff and any other incidental costs advanced by Brown Rudnick specifically for the representation of the Equity Committee, in a manner and at rates consistent with charges made generally to Brown Rudnick's other clients. Photocopies and similar copies will be billed at a reduced rate of \$0.10 per page.

20. Brown Rudnick has not agreed to share (a) any compensation it may receive with another party or person, other than with the partners, counsel, and associates of Brown Rudnick;

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<sup>3</sup> In the ordinary course, Brown Rudnick reviews the billing rates of its attorneys and paraprofessionals annually. The review and rate increases are based upon increases within each attorney's and paraprofessional's current level of seniority. The rates described herein reflect the most recent rate increase. As set forth in the attached order, Brown Rudnick will provide ten (10) calendar days' notice to the Equity Committee, the Debtors, and the U.S. Trustee before implementing any periodic increases, and shall file any such notice with the Court.

or (b) any compensation another person or party has received or may receive in connection with these Cases.

21. Brown Rudnick has not received a retainer in connection with these Cases.

**AFFIRMATIVE STATEMENT OF DISINTERESTEDNESS**

22. Based upon the information available to me, and except as otherwise described herein, Brown Rudnick holds no interest adverse to the Debtors, their estates, or any class of creditors or equity holders as to the matters in which it is to be employed. I know of no reason why Brown Rudnick cannot act as counsel to the Equity Committee.

**STATEMENT REGARDING U.S. TRUSTEE GUIDELINES**

23. The following information is provided pursuant to paragraph D.1 of the U.S. Trustee Guidelines:

<b>QUESTION:</b>	Did you agree to any variations from, or alternatives to, your standard or customary billing arrangements for this engagement?
Response:	Brown Rudnick will comply with the United States Trustee's Fee Guidelines in connection with this engagement.
<b>QUESTION:</b>	Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?
Response:	No.
<b>QUESTION:</b>	If you represented the client in the 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If your billing rates and material financial terms have changed postpetition, explain the difference and the reasons for the difference.
Response:	No.
<b>QUESTION:</b>	Has your client approved your prospective budget and staffing plan, and, if so, for what budget period?
Response:	The Equity Committee will approve a budget and general staffing plan in connection with its representation of the Equity Committee.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: September 27, 2023

/s/ Robert J. Stark

Robert J. Stark

**Schedule 1**  
**(Case Parties)**

### **Debtor Entities**

1. Lordstown Motors Corp. (DE)
2. Lordstown EV Corp. (DE)
3. Lordstown EV Sales LLC (DE)

### **Related/Former Names of Entities**

1. DiamondPeak Holdings Corp. (n/k/a Lordstown Motors Corp.)
2. DPL Merger Sub Corp. (n/k/a Lordstown EV Corporation)
3. MIH EV Design, LLC

### **Directors and Officers**

1. Adam Kroll
2. Angela Strand
3. Dale Spencer
4. Daniel Ninivaggi
5. David T. Hamamoto
6. Donna Bell
7. Edward T. Hightower
8. Jane Reiss
9. Joseph B. Anderson Jr.
10. Keith Feldman
11. Laura Soave
12. Melissa Leonard

### **Former Directors and Officers**

1. Jane Ritson-Parsons
2. John LeFleur
3. John R. Whitcomb
4. Michael Gates
5. Mickey Kowitz
6. Martin Rucidlo
7. Rebecca Roof
8. Stephen S. Burns
9. Thomas V. Canepa

### **Senior Employees**

1. Cheryl Johnson
2. Darren Post
3. Jill Coniglio-Kirk
4. Carter Driscoll
5. Michael Port
6. Raghu Aerabati
7. Waqar Hashim
8. Andrew Reyntjes

### **Top Unsecured Creditors**

1. Amphenol Interconnect Products Corporation
2. AP Expert Group LLC
3. AT&T MOBILITY-CC
4. Barry L. Leonard and Company Inc. dba Trans Machine Technologies
5. Bossard Inc.
6. CEVA Contract Logistics US Inc
7. Cognizant Mobility, Inc
8. Elaphe Propulsion Technologies LTD
9. Fiberdyne Research Pty Ltd
10. Filec Production SAS - Amphenol
11. Foxconn EV System LLC
12. Greatech Intergration (M) SDN.BHD.
13. Harco Manufacturing Group, LLC
14. HRB Industries Corp.
15. JVIS USA LLC
16. Laval Tool & Mould LTD.
17. Marelli North America Inc dba CalsonicKansel North America Inc
18. Meta Systems SpA
19. Nexteer Automotive Corporation
20. Pektron EV Limited
21. Proper Group Holdings LLC dba Proper Tooling LLC
22. Quality MetalCraft Inc.
23. SA Automotive LTD
24. Sharp Dimension Inc
25. St. Clair Technologies Inc.
26. Superior Cam Inc
27. Technology Solutions Anywhere LLC dba Readysoft
28. Teijin Automotive Technologies, Inc

29. The Timken Corporation
30. Three-Dimensional Services dba 3 Dimensional Services Group
31. thyssenkrupp Materials NA, Inc. dba Ken-Mac Metals or thyssenkrupp Steel Services
32. Ventra Group Co. dba Flex-N-Gate Bradford
33. VIA Optronics LLC
34. Zetwerk Manufacturing USA, Inc.
35. ZF Passive Safety Systems US Inc.

#### **Cash Management Banks**

1. JP Morgan Asset Management
2. JP Morgan Chase Bank, N.A.
3. JP Morgan Institutional Investments Global Liquidity
4. JP Morgan Prime
5. JP Morgan Securities

#### **Significant Lease and Contract Counterparties**

1. 275 Hills Tech Ventures LLC
2. Aon (Bermuda) Ltd.
3. Aon Risk Services Central Inc.
4. Aon UK Limited
5. Arthur J. Gallagher Risk Management Services, Inc.
6. Applied Medical Resources Corporation
7. Cigna Health and Life Insurance Company
8. Elaphe Propulsion Technologies Ltd.
9. Foxconn EV Property Development LLC
10. Foxconn EV System LLC
11. GAC R&D Center Detroit, LLC
12. General Motors
13. GM EV Holdings LLC
14. Liberty Property and Asset Management
15. Michigan Strategic Fund
16. Paylocity Corporation
17. Principal Life Insurance Company
18. TenantBase, Inc.
19. TransAmerica Corporation

20. Willowgreen Building Group, LLC
21. Workhorse Group Inc.

#### **Significant Vendors**

1. A Say Inc dba Say Communications LLC
2. A.K.Stamping Company, Inc
3. ABSOLUTE ELECTRONICS INC
4. Akebono Brake Company
5. Amphenol Interconnect Products Corporation
6. Anchor Tool and Die Company dba Anchor Manufacturing Group, Inc.
7. Anderton Castings SAS
8. AP Expert Group LLC
9. Armada Toolworks LTD.
10. AT&T MOBILITY-CC
11. ATCO Industries, Inc.
12. Auto Motive Power Inc
13. Baker Hostetler
14. Barry L. Leonard and Company Inc. dba Trans Machine Technologies
15. Bennie W Fowler, LLC
16. Bossard Inc.
17. Brikho & Kallabat, P.C. DBA Joseph Kallabat and Associates, PC
18. CEVA Contract Logistics US Inc
19. CEVA International, Inc
20. CITIC Dicastal Co., Ltd.
21. Cognizant Mobility, Inc
22. Cognizant Worldwide Limited
23. Complete Discovery Source, Inc (CDS)
24. Contour Hardening Inc.
25. Cox Automotive Mobility Solutions, Inc
26. Cox Automotive, Inc - Manheim
27. Custodial Building Services, Inc
28. DAG LTD, LLC
29. Detroit Engineered Products dba DEP
30. Duggan Manufacturing LLC
31. Elaphe Propulsion Technologies LTD
32. Fiberdyne Research Pty Ltd
33. Filec Production SAS - Amphenol
34. Foshan Aoya Electrical and Mechanical Co., Ltd.

35. Foxconn EV Property Development LLC
36. Foxconn EV System LLC
37. Greatech Intergration (M) SDN.BHD.
38. Harco Manufacturing Group, LLC
39. Haynes and Boone, LLP
40. HRB Industries Corp
41. HubSpot Inc
42. IEE S.A.
43. Infosys Limited
44. Jiangyin Haida Rubber and Plastic Co., Ltd. dba Haida
45. JVIS USA LLC
46. KPMG LLP
47. Lasky, LLC
48. Laval Tool & Mould LTD.
49. Logicalis, Inc.
50. Lumma Clean LLC
51. Mahle Behr USA Inc
52. Mainfreight, Inc - Canada
53. Mainfreight, Inc.
54. Marelli North America Inc dba CalsonicKansel North America Inc
55. Megatronix (Beijing) Technology Co., Ltd.
56. Meta Systems SpA
57. Miotti Srl
58. Mosaic Corporation
59. MSSC US INC.
60. New Eagle, LLC
61. Nexteer Automotive Corporation
62. OpenText Inc.
63. Payscale Inc
64. Pektron EV Limited
65. Pi Innovo LLC
66. Pierburg US LLC
67. Potter Anderson & Corron LLP
68. Principal Life Insurance Company
69. Proper Group Holdings LLC dba Proper Tooling LLC
70. Quality MetalCraft Inc.
71. Racar Engineering, LLC
72. Ready Logistics, LLC
73. Roush Industries, Inc.
74. RTL Systems, LLC
75. SA Automotive LTD
76. Schwab Industries, Inc.
77. SG Automotive d.o.o.
78. Sharp Dimension Inc
79. Sherpa Commercial Vehicles, LLC
80. Silverman Consulting, Inc
81. Simpson Thacher & Bartlett LLP
82. Socotec Advisory, LLC
83. St. Clair Technologies Inc.
84. Sullivan & Cromwell LLP
85. Superior Cam Inc
86. Sybridge Technologies Canada, Inc
87. Technology Solutions Anywhere LLC dba Readysoft
88. Teijin Automotive Technologies, Inc
89. TERIS - Phoenix LLC DBA TERIS
90. The Timken Corporation
91. Three-Dimensional Services dba 3 Dimensional Services Group
92. thyssenkrupp Materials NA, Inc. dba Ken-Mac Metals or thyssenkrupp Steel Services
93. Transportation Research Center, Inc. dba TRC, Inc.
94. Triple Crown Consulting, LLC
95. TTI, INC dba Symmetry Electronics (a division of TTI, Inc.) and RFMW(a division of TTI, Inc.)
96. Ventra Group Co. dba Flex-N-Gate Bradford
97. VIA Optronics LLC
98. Victora Auto Private Limited
99. Zetwerk Manufacturing USA, Inc
100. ZF PASSIVE SAFETY SYSTEMS US INC.

#### **Customers**

1. Army Contracting Command - Detroit Arsenal (ACC-DTA)
2. City of Washington, D.C.
3. Greenstreet EV Inc.
4. JoeyB QB LLC
5. Pratt & Miller Engineering & Fabrication LLC
6. San Diego Unified Port District
7. Sherpa Commercial Vehicles LLC

**Investors with over 5% Holdings**

1. Foxconn (Far East) Limited
2. Foxconn EV Technology, Inc.
3. Foxconn Ventures Pte. Ltd.
4. Foxteq Holdings Inc.
5. Foxteq Integration Inc.
6. Hon Hai Precision Industry Co., Ltd.
7. Hon Hai Technology Group
8. PCE Paragon Solutions Kft.

**Debtor Restructuring Professionals**

1. Jefferies Group LLC
2. Kurtzman Carson Consultants, LLC
3. Richards Layton & Finger, P.A.
4. Silverman Consulting, Inc.
5. White & Case LLP

**Ordinary Course Professionals & Professionals of Parties in Interest**

1. Akin Gump Strauss Hauer & Feld LLP
2. Ankura Intermediate Holdings, LP dba Ankura Consulting Group LLC
3. Baker & Hostetler LLP
4. Bernstein Litowitz Berger & Grossman, LLP
5. Bodman PLC
6. Climaco, Wilcox, Peca, Tarantino & Garofoli
7. Cohen Rosenthal & Kramer
8. Cooch and Taylor
9. Cummins Law
10. deLeeuw Law LLC
11. Dechert LLP
12. Deloitte & Touche LLP
13. Dentons US
14. Dittmer, Wagoner & Steele
15. Elfvin, Klingshirn, Royer & Torch, LLC
16. Employment Law Partners
17. Entwistle & Cappucci LLP
18. Ernst & Young U.S. LLP
19. Fisher and Phillips LLP
20. Foley & Lardner LLP
21. FTI Consulting, Inc.
22. Gladstein, Neandross & Associates

23. Hagens Berman Sobol Shapiro LLP
24. Haynes and Boone, LLP
25. Kaskela Law LLC
26. Kooperman Mentel Ferguson Yaross
27. KPMG LLP
28. Labaton Sucharow LLP
29. Latham & Watkins LLP
30. Law Office of Daniel R. Karon
31. Lasky, LLC
32. Lifshitz Law PLLC
33. Long Law, LLC
34. Mercer Capital Management, Inc.
35. Merriman Legando Williams & Klang
36. Murray, Murphy, Moul & Basil
37. Nelson Mullins Riley & Scarborough LLP
38. Paul Hastings LLP
39. Perantinides & Nolan
40. Perez & Morris
41. Phillips ADR Enterprises PC
42. Pomerantz LLP
43. Potter Anderson & Corroon LLP
44. Prospect Law LLP
45. Purcell & Lefkowitz LLP
46. Robbins Geller Rudman & Dowd
47. RSM US LLP
48. Saxena White
49. Schall Law
50. Schubert Jonckheer & Kolbe LLP
51. Seyfarth Shaw LLP
52. Shapiro Haber & Urmy LLP
53. Simpson Thacher & Bartlett LLP
54. Socotec Advisory, LLC
55. Strauss Troy
56. Sullivan & Cromwell LLP
57. The Brown Law Firm, P.C.
58. The Rosen Law Firm, P.A.
59. Winston & Strawn LLP
60. WIT Legal, LLC
61. Zoll & Kranz



### **Insurance Parties**

1. Accredited Specialty Insurance Company
2. Allied World Specialty Insurance Company
3. Associated Industries Insurance Co., Inc
4. AXIS Insurance Company
5. Berkley Insurance Company
6. CFC Underwriting / Lloyds
7. Continental Casualty Company
8. Endurance Assurance Corporation
9. Fair American Insurance & Reinsurance Co
10. Gemini Insurance Company
11. General Star Indemnity Company
12. Hudson Insurance Company
13. Ironshore Specialty Insurance Company
14. Magna Carta Insurance Ltd. / Lloyds
15. National Union Fire Ins Co of Pittsburgh, PA
16. RSUI Indemnity Company
17. RT Specialty Insurance Services, LLC
18. Samsung Fire & Marine Ins Co Ltd (US Br)
19. SiriusPoint Bermuda Insurance Company
20. The Cincinnati Indemnity Company
21. The Cincinnati Insurance Company
22. Underwriters At Lloyds London
23. Westfield Specialty Insurance Comp
24. XL Specialty Insurance Company

### **Utilities**

1. AT&T Business Direct
2. AT&T MOBILITY-CC
3. Comcast Holdings Corporation dba Comcast Cable Communication Management LLC
4. Cox Communications California LLC dba Cox Business
5. CR&R Environmental Services
6. Detroit Disposal & Recycling
7. Irvine Ranch Water District
8. Sonitrol Orange County

9. Southern California Edison
10. Southern California Gas Company dba The Gas Company; So Cal Gas

### **Taxing and Regulatory Authorities**

1. California Franchise Tax Board
2. California Department of Tax and Fee Administration
3. California State Board of Equalization
4. Committee on Foreign Investment in the United States
5. Delaware Secretary of State
6. Delaware State Treasury
7. Delaware Tax Authority
8. Internal Revenue Service
9. Michigan Department of Treasury
10. National Highway Traffic Safety Administration
11. Ohio Bureau of Workers' Compensation
12. Ohio Department of Taxation
13. Orange County Property Taxes
14. Pipeline and Hazardous Materials Safety Administration
15. Securities and Exchange Commission
16. U.S. Department of Justice
17. U.S. Patent and Trademark Office
18. Village of Lordstown, OH Income Tax Department

### **Litigation Parties**

1. Alicia Kelley
2. An Thai
3. Andrew C. Richardson
4. Angela Strand Boydston
5. Ashith Pabbathi
6. Atri Amin
7. Bei Qin
8. Benjamin Herbert
9. Caimin Flannery
10. Carole Cooper
11. Christopher Kim
12. Chuan D. Vo
13. Claude L. Patterson
14. Dale G. Spencer
15. Dan Zhihong Huang

16. Daniel J. Cohen
17. Daniel Tavares
18. Dari Tehrani
19. Darren Post
20. David M. Cohen
21. David T. Hamamoto
22. Ed Lomont
23. Eskander Tehrani
24. Ethan Fingerer
25. Evaristo Sarabia
26. FNY Managed Accounts LLC
27. George Troicky
28. Globestar Systems Inc.
29. Gurpreet Singh
30. Herbert Stotler
31. Hong Xin Huan (a/k/a George Huan)
32. Jane Reiss
33. Janelle Jackson
34. Jesse Brury
35. John H. Jenkins
36. John LeFleur
37. John Vo
38. Joshua Betof
39. Judith A. Hannaway
40. Julio C. Rodriguez
41. Karma Automotive LLC
42. Keith A. Feldman
43. Kenneth Davenport
44. Kevin Levent
45. Kin San Chan
46. M.R.S. Leasing Corporation LTD
47. Mario Guerrero
48. Mark A. Walsh
49. Martin J. Rucidlo
50. Matthew Rico
51. Michael Fabian
52. Michael D. Gates
53. Mickey W. Kowitz
54. Mohammed Chowdhury
55. Phil Richard Schmidt
56. Pnina Cohen
57. Punak Engineering, Inc.
58. Randy Slipher
59. Raymond Romano
60. Robert Miller
61. Robert Palumbo

62. Roger J. Durre
63. Shane Brown
64. Simha Cohen
65. Stephen Punak
66. Stephen S. Burns
67. Steven R. Hash
68. Steven Terry
69. Sulayman Zuod
70. DiamondPeak Sponsor LLC
71. Silverpeak and related entities (which includes SP SPAC Sponsor LLC, Silverpeak Real Estate Partners L.P., Silverpeak Strategic Partners LLC, Silverpeak Credit Partners LP, Silverpeak Renewables Investment Partners LP, and certain other affiliated entities)

#### **Lien Holders**

1. Competition Engineering, Inc.
2. Foxconn EV Technology, Inc.
3. Hewlett-Packard Financial Services Company
4. Peterson Jig and Fixture, Inc.
5. Precision Jig and Fixture
6. Proper Tooling, LLC & Proper Group International, LLC

#### **Office of the United States Trustee (Wilmington, DE)**

1. Andrew Vara
2. Benjamin Hackman
3. Christine Green
4. Denis Cooke
5. Diane Giordano
6. Dion Wynn
7. Edith A. Serrano
8. Hannah M. McCollum
9. Holly Dice
10. James R. O'Malley
11. Jane Leamy
12. Joseph Cudia
13. Joseph McMahon
14. Juliet Sarkessian
15. Karen Starr
16. Lauren Attix

17. Linda Casey
18. Linda Richenderfer
19. Michael Panacio
20. Nyanquoi Jones
21. Richard Schepacarter
22. Rosa Sierra-Fox
23. Shakima L. Dortch
24. Timothy J. Fox, Jr.

**United States Bankruptcy Judges in the  
District of Delaware**

1. Ashley M. Chan
2. Brendan L. Shannon
3. Craig T. Goldblatt
4. John T. Dorsey
5. Karen B. Owens
6. Kate Stickles
7. Laurie S. Silverstein
8. Mary F. Walrath
9. Thomas M. Horan

**Other Parties in Interest**

1. Softbank
2. Blackrock Institutional Trust Company,  
N.A.
3. Blackrock

**Schedule 2**  
**(Connections Check)**

Individual's First Name	Individual's Last Name/Entity Name	Bankruptcy Role	Current Client [X=Yes]	Former Client [X=Yes]	Adverse To Or Aligned With Current Or Former Clients In Unrelated Matters (Applicable to Searched Entity or Affiliate of Searched Entity) [X=Yes]
	Akin Gump Strauss Hauer & Feld LLP	Ordinary Course Professionals & Professional or Parties in Interest			X
	Allied World Specialty Insurance Company	Insurance Parties			X
	Ankura Intermediate Holdings, LP dba Ankura Consulting Group LLC	Ordinary Course Professionals & Professional or Parties in Interest			X
	Aon (Bermuda) Ltd.	Significant Lease and Contract Counterparties			X
	AT&T Business Direct	Utilities	X (applicable to affiliate of searched entity)		
	AT&T Mobility-CC	Utilities; Creditor; Significant Vendors	X		
	ATCO Industries, Inc.	Significant Vendors			X
	AXIS Insurance Company	Insurance Parties			X
	Baker & Hostetler LLP	Ordinary Course Professionals & Professional or Parties in Interest; Significant Vendors			X
	Berkley Insurance Company	Insurance Parties		X (applicable to affiliate of searched entity)	X
	Blackrock	Other Parties in Interest		X	X
	Bossard Inc.	Creditor; Significant Vendors			X
	California Department of Tax and Fee Administration	Taxing and Regulatory Authorities			X
	California Franchise Tax Board	Taxing and Regulatory Authorities			X
	California State Board of Equalization	Taxing and Regulatory Authorities			X
	CFC Underwriting / Lloyds	Insurance Parties		X	X
	Cigna Health and Life Insurance Company	Significant Lease and Contract Counterparties			X
	City of Washington, D.C.	Customers			X
	Cognizant Mobility, Inc	Creditor; Significant Vendors	X (applicable to affiliate of searched entity)		
	Cognizant Worldwide Limited	Significant Vendors	X (applicable to affiliate of searched entity)		
	Comcast Holdings Corporation dba Comcast Cable Communication Management LLC	Utilities		X (applicable to affiliate of searched entity)	X
	Continental Casualty Company	Insurance Parties			X
	Cooch and Taylor	Ordinary Course Professionals & Professional or Parties in Interest			X
	Cox Automotive Mobility Solutions, Inc	Significant Vendors	X	X (applicable to affiliate of searched entity)	
	Cox Automotive, Inc - Manheim	Significant Vendors	X	X (applicable to affiliate of searched entity)	
	Cox Communications California LLC dba Cox Business	Utilities	X (applicable to affiliate of searched entity)		X
	Crestline Management, L.P	Equity Committee Member or Representative			X
	Dechert LLP	Ordinary Course Professionals & Professional or Parties in Interest			X
	Deloitte & Touche LLP	Ordinary Course Professionals & Professional or Parties in Interest			X
	Dentons US	Ordinary Course Professionals & Professional or Parties in Interest			X
	DiamondPeak Holdings Corp. (n/k/a Lordstown Motors Corp.)	Related/Formers Names of Entities			X
	DPL Merger Sub Corp. (n/k/a Lordstown EV Corporation)	Related/Formers Names of Entities			X
	Endurance Assurance Corporation	Insurance Parties			X
	Ernst & Young U.S. LLP	Ordinary Course Professionals & Professional or Parties in Interest			X
	Esopus Creek Value Series Fund LP – Series A	Equity Committee Member or Representative			X
	Fisher and Phillips LLP	Ordinary Course Professionals & Professional or Parties in Interest			X
	Foley & Lardner LLP	Ordinary Course Professionals & Professional or Parties in Interest			X
	FTI Consulting, Inc.	Ordinary Course Professionals & Professional or Parties in Interest		X (applicable to affiliate of searched entity)	X
	Gemini Insurance Company	Insurance Parties			X
	General Motors	Significant Lease and Contract Counterparties			X
	General Star Indemnity Company	Insurance Parties			X
	Hagens Berman Sobol Shapiro LLP	Ordinary Course Professionals & Professional or Parties in Interest		X	X
	Haynes and Boone, LLP	Significant Vendors			X
	Hewlett-Packard Financial Services Company	Lien Holders		X (applicable to affiliate of searched entity)	X
	HubSpot Inc	Significant Vendors		X	
	Hudson Insurance Company	Insurance Parties			X
	Internal Revenue Service	Taxing and Regulatory Authorities			X
	Ironshore Specialty Insurance Company	Insurance Parties			X
	Irvine Ranch Water District	Utilities			X
	Jefferies Group LLC	Debtors Restructuring Professionals			X
	JP Morgan Asset Management	Cash Management Banks			X

Individual's First Name	Individual's Last Name/Entity Name	Bankruptcy Role	Current Client [X=Yes]	Former Client [X=Yes]	Adverse To Or Aligned With Current Or Former Clients In Unrelated Matters (Applicable to Searched Entity or Affiliate of Searched Entity) [X=Yes]
	JP Morgan Chase Bank, N.A.	Cash Management Banks			X
	JP Morgan Securities	Cash Management Banks			X
	Karma Automotive LLC	Litigation Parties			X
	KPMG LLP	Ordinary Course Professionals & Professional or Parties in Interest; Significant Vendors		X	X
	Latham & Watkins LLP	Ordinary Course Professionals & Professional or Parties in Interest			X
	Liberty Property and Asset Management	Significant Lease and Contract Counterparties			X
	Lordstown EV Corp. (DE)	Debtor			X
	Lordstown EV Sales LLC (DE)	Debtor			X
	Lordstown Motors Corp. (DE)	Debtor			X
	Mahle Behr USA Inc	Significant Vendors			X
	Michigan Department of Treasury	Taxing and Regulatory Authorities			X
	MIH EV Design, LLC	Related/Former Names of Entities			X
	National Highway Traffic Safety Administration	Taxing and Regulatory Authorities			X
	National Union Fire Ins Co of Pittsburgh, PA	Insurance Parties			X
	Nelson Mullins Riley & Scarborough LLP	Ordinary Course Professionals & Professional or Parties in Interest			X
	Ohio Department of Taxation	Taxing and Regulatory Authorities			X
	Paul Hastings LLP	Ordinary Course Professionals & Professional or Parties in Interest			X
	Principal Life Insurance Company	Significant Lease and Contract Counterparties; Significant Vendors			X
	Robbins Geller Rudman & Dowd	Ordinary Course Professionals & Professional or Parties in Interest			X
	RSM US LLP	Ordinary Course Professionals & Professional or Parties in Interest			X
	RSUI Indemnity Company	Insurance Parties			X
	Securities and Exchange Commission	Taxing and Regulatory Authorities			X
	Seyfarth Shaw LLP	Ordinary Course Professionals & Professional or Parties in Interest			X
	Simpson Thacher & Bartlett LLP	Ordinary Course Professionals & Professional or Parties in Interest; Significant Vendors			X
	Softbank	Other Parties in Interest			X (applicable to affiliates of searched entity)
Andrew L.	Sole	Equity Committee Member or Representative			X
	Southern California Edison	Utilities			X
	Sullivan & Cromwell LLP	Ordinary Course Professionals & Professional or Parties in Interest; Significant Vendors			X
	Teijin Automotive Technologies, Inc	Creditor; Significant Vendors		X (applicable to affiliate of searched entity)	
	thyssenkrupp Materials NA, Inc. dba Ken-Mac Metals or thyssenkrupp Steel Services	Creditor; Significant Vendors		X (applicable to affiliate of searched entity)	X
	TransAmerica Corporation	Significant Lease and Contract Counterparties			X
	Transportation Research Center, Inc. dba TRC, Inc.	Significant Vendors		X	
	U.S. Department of Justice	Taxing and Regulatory Authorities			X
	U.S. Patent and Trademark Office	Taxing and Regulatory Authorities			X
	Underwriters At Lloyds London	Insurance Parties			X
	White & Case LLP	Debtors Restructuring Professionals			X
	Winston & Strawn LLP	Ordinary Course Professionals & Professional or Parties in Interest			X
	XL Specialty Insurance Company	Insurance Parties			X